



ROY ROMER
Governor

PATRICIA A. NOLAN, MD, MPH
Executive Director

Hazardous Materials and Waste Management Division
4210 East 11th Avenue
Denver, Colorado 80220-3716
(303) 331-4830 / FAX (303) 331-4401

Telefax Numbers:
Main Building, Denver
(303) 322-9076

Parmigan Place, Denver
(303) 320-1529

First National Bank Building, Denver
(303) 355-6559

Grand Junction Office
(303) 248-7198

Pueblo Office
(719) 543-8441

August 28, 1992

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

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RE: Final No Further Action Justification (NFAJ) Document for OU 16 Low
Priority Sites, July 1992

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document submitted by DOE and prime operating contractor, EG&G. The Division's comments, as well as those from EPA, are attached.

The Division is pleased with the improvements in the new NFAJ document when compared to the draft version. However, the NFAJ Document still does not demonstrate, to the Division's satisfaction, that the IHSSs in OU 16 proposed for no further action present an acceptable level of risk to human health and the environment. In addition, the attached comments outline problems with what is proposed for IHSSs 196 and 197. Therefore, we are withholding approval of the document.

The Division requests submission of a revised NFAJ by October 16, 1992. There is no need to resubmit the entire NFAJ Document; updated replacement pages, figures, tables, or entire sections will suffice.

If you have any questions regarding these matters, please call John Reschl of my staff at 331-4803.

Sincerely,

Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

cc: Martin Hestmark, EPA
{Bob Birk} DOE
Mike Arndt, EG&G
Ken Pacheco, EG&G
Jackie Berardini, CDH-OE

ADMIN RECORD



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